

## REMARKS

Claims 1-20 are pending in this application. Claims 1 and 11-15, and 18-20 are amended. No range of equivalents is surrendered or is intended to be surrendered by these amendments.

In view of the foregoing amendments and following remarks, Applicants respectfully request the Examiner to reconsider and withdraw all outstanding grounds of rejection. Applicants respectfully request allowance of the application.

The Office Action rejects under 35 U.S.C. 103(a) claims 1-6, 8-9, 11-15 and 18-19 as being unpatentable over Jones et al., U.S. Patent No. 6,493,731 (hereinafter *Jones*). The Office Action rejects under 35 U.S.C. 103(a) claims 7 and 20 as being unpatentable over *Jones* in view of “W3C’s XML 1.0.” The Office Action rejects under 35 U.S.C. 103(a) claim 10 as being unpatentable over *Jones* in view of Tabb et al., U.S. Patent No. 5,603,025 (hereinafter *Tabb*). The Office Action rejects under 35 U.S.C. 103(a) claims 16 and 17 as being unpatentable over *Jones* in view of “XML Programming with C++.”

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, finally the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See, MPEP Section 706.02 (j).*

Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness.

For example, with respect to the rejection of independent claim 1, independent claim 1 recites, among other features “a first set of data fields, wherein the data fields represent attributes of a parent transaction and include a sub-identifier field; and...the sub-identifier field including metadata from the first set of metadata that identifies a secondary transaction, the metadata in the sub-identifier field including linking data generated by the secondary transaction to the active document, wherein the data generated by the secondary transaction is used to update the active document.” Independent claim 1 has been amended to include features described at, for example, page 8, lines 14-20 and page 11, lines 2-5 of the specification. No new matter has been added.

Applicants submit that the applied reference(s) do not teach or suggest all the claim limitations as recited in independent claim 1, as presented.

Applicants disagree that *Jones* relates to transactions such as transactions related to business processes conducted over the internet and/or for systems for improving the sharing and accessing of information regarding transactions. However, assuming arguendo that *Jones* relates to such transactions, *Jones* fails to disclose or suggest all the claimed limitations. For example, *Jones* does not disclose or suggest that the data generated by the secondary transaction is used to update the active document, as claimed. The Office Action at page 2, paragraph 4, admits that *Jones* does not specifically teach that changes to the secondary documents update the data fields in the parent document task. However, the Office Action considers such limitations do not include any inventive step. The Office Action contends that it would have been obvious to one of ordinary skill in the art at the time the invention was made that changes in metadata of the secondary documents would be displayed in the parent document transaction viewable by the user. Applicants respectfully disagree with this contention.

Applicants respectfully submit that the Office Action provides no motivation or suggestion, within the references or in the knowledge generally available to one of ordinary skill in the art, to modify the reference teachings of *Jones* such that changes to the secondary documents update the data fields in the parent document task. *Jones* relates to a document management system for recording and viewing metadata of a document. The document metadata is used to record resources referenced while the content of the document is developed. See, Abstract. As further stated at col. 5, lines 23-40, anything that contributes to the context of task history is an example of resources for a task and a resource is any item that assisted someone in preparing a task document. Examples include, procedural manuals, related documents and examples of previous cases. In referencing such resources, *Jones* permits an individual performing a task to review the application document in the context of the resource documents from which it was formulated. See, col. 5, lines 49-56. There is no suggestion or motivation in *Jones* that modification of the resource documents would update the application document.

Based on the above, Applicants respectfully submit that the Office Action fails to establish a *prima facie* case of obviousness with respect to the claimed invention as required by the *MPEP Section 706.02 (j)*. Applicants respectfully submit that independent claim 1 is patentably distinguishable over the applied art for at least the reasons indicated above and is in condition for allowance.

To the extent that independent claim 11 (as presented) includes features of independent claim 1, independent claim 11 is in condition for allowance for at least the

reasons stated above with respect to independent claim 1 and for the additional features recited therein.

Independent claim 18 recites, among other features “updating the parent transaction resource with the transaction specific data from the secondary transaction resource, wherein any changes to the transaction specific data are made to the data fields in the parent transaction resource....” Applicants submit that the applied reference(s) does not disclose or suggest at least this feature of independent claim 18 (original). As admitted in the Office Action at paragraph 4, this feature, for example, is not taught or suggested in *Jones*. Moreover, as described above with respect to independent claim 1, it would not have been obvious to modify *Jones* to include this feature since no suggestion or motivation exists in *Jones* for one of ordinary skill in the art to make such modification.

Applicants respectfully submit that the Office Action fails to establish a *prima facie* case of obviousness with respect to independent claim 18 as required by the *MPEP Section 706.02 (j)*. Applicants respectfully submit that independent claim 18 is patentably distinguishable over the applied art for at least the reasons indicated above and is in condition for allowance.

Claims 2-10 depend from independent claim 1, claims 12-17 depend from independent claim 11, and claims 19-20 depends from independent claim 18. Therefore, claims 2-10, 12-17 and 19-20 are allowable for the reasons stated above with respect to the claim from which they depend, and for the additional features recited therein.

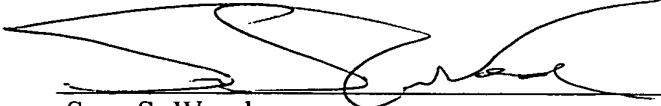
In view of the above, Applicants respectfully request reconsideration, withdrawal of the rejection of claims 1-20 under 35 U.S.C. § 103(e), and allowance of the claims.

### **CONCLUSION**

In view of the above amendments and remarks, Applicants believe that all of the objections and rejections against this application have been fully addressed and that the application is now in condition for allowance. Therefore, withdrawal of the outstanding objections and rejections and a notice of allowance for the application is respectfully requested.

If the Examiner believes that a personal or telephonic interview would be of value in expediting the prosecution of this application, the Examiner is hereby invited to telephone the undersigned counsel to arrange for such a conference.

Respectfully submitted,



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